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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., A Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
AND SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-00106-LRH-PAL

**DECLARATION OF BREE HANN IN
SUPPORT OF THE PARTIES'
JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

1 I, Bree Hann, declare as follows:

2 1. I am a member of the State Bar of California, and a partner at Bingham
3 McCutchen LLP, counsel of record for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and
4 Oracle International Corporation (collectively, "Oracle") in this action. I have personal
5 knowledge of the matters stated herein and could and would testify competently about them if
6 called upon to do so.

7 2. Defendant Rimini Street, Inc. ("Rimini") served the interrogatories on which it
8 now moves to compel on June 11, 2010 and October 3, 2011. Oracle timely responded on July
9 21, 2010 and November 21, 2011, with supplemental responses on December 9, 2010, December
10 15, 2011, and December 19, 2011. The latter two supplements were not in response to any
11 complaint from Rimini.

12 3. I am informed that from the time Oracle served its responses to Rimini's
13 Interrogatory Nos. 11, 17-20, 25, 27, 30, 32 and 35-37 until December 6, 2011, Rimini never
14 complained to Oracle about these interrogatory responses, and never asked Oracle to meet and
15 confer about them.

16 4. Attached as **Exhibit A** is a true and correct copy of Rimini's second Rule 30(b)(6)
17 notice to Oracle (the "Second Notice"), served on September 28, 2011. It includes 61 topics.

18 5. On October 11, 2011, Oracle objected to the Second Notice and requested that
19 Rimini meet and confer on the topics. Attached as **Exhibit B** is a true and correct copy of an
20 October 11, 2011 letter from Thomas S. Hixson, counsel for Oracle, to Robert H. Reckers,
21 counsel for Defendants, setting out Oracle's objections and meet and confer request.

22 6. Attached as **Exhibit C** is a true and correct copy of Rimini's third Rule 30(b)(6)
23 notice to Oracle (the "Third Notice"), served on November 4, 2011. It includes 22 topics.

24 7. Attached as **Exhibit D** is a true and correct copy of a November 17, 2011 letter
25 from Mr. Hixson to Mr. Reckers.

26 8. Attached as **Exhibit E** is a true and correct copy of a December 6, 2011 letter
27 from Mr. Reckers to Mr. Hixson.

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1 9. On December 22, 2011, I participated in a telephonic meet and confer with Kieran
2 Ringgenberg, co-counsel for Oracle, and Mr. Reckers, Michelle Marriott, and Megan Redmond,
3 counsel for Defendants. During that meet and confer, Ms. Marriott and Ms. Redmond reiterated
4 Rimini's December 6 suggestion that Oracle could supplement certain interrogatory responses
5 rather than provide a Rule 30(b)(6) witness on certain topics.

6 10. Attached as **Exhibit F** is a true and correct copy of pages 34 through 37 of the
7 transcript of the Status Conference held in this action on November 8, 2011.

8 11. In the eighteen months prior to December 6, 2011 (the fact discovery cutoff),
9 Rimini took the depositions of eight Oracle witnesses: Buffy Ransom on April 21, 2011; John
10 Marandola on May 12, 2011; David Renshaw on May 26, 2011; Sean Fitzpatrick on June 17,
11 2011; Rick Cummins on July 13, 2011; Jason Taylor on July 20, 2011; Richard Foster on August
12 4, 2011; and Robbin Henslee on August 24, 2011. After the discovery cutoff, Rimini deposed
13 Charles Phillips on December 9, 2011, Richard Allison on December 20, 2011, Safra Catz on
14 December 14, 2011, and Juan Jones on January 5, 2012.

15 12. Attached as **Exhibit G** is a true and correct copy of a December 23, 2011 email
16 from Ms. Marriott to me, copying other counsel in this action.

17 13. Attached as **Exhibit H** is a compilation of the interrogatories on which Rimini
18 moves to compel, including Oracle's most recent response to each.

19 14. Attached as **Exhibit I** is a true and correct copy of pages 162-169 of the
20 Deposition of Richard Allison, taken on December 20, 2011, with certain irrelevant portions
21 redacted.

22 15. Attached as **Exhibit J** is a true and correct copy of Defendant Rimini Street,
23 Inc.'s Fifth Set of Interrogatories to Plaintiffs, served on October 3, 2011.

24 16. Attached as **Exhibit K** is a true and correct copy of Plaintiffs Oracle USA, Inc.,
25 Oracle America, Inc., and Oracle International Corporation's Fifth Set of Interrogatories to
26 Defendant Rimini Street, Inc., served on May 25, 2011.

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct, and that this Declaration was signed on January 6, 2012, in San
3 Francisco, California.

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5 /s/ Bree Hann

Bree Hann
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